

1 **JAMES F. HOLTZ, ESQ.**
Nevada Bar No. 8119
2 **MICHAEL G. TRIPPIEDI, ESQ.**
Nevada Bar No. 13973
3 **RANALLI ZANIEL FOWLER & MORAN, LLC**
2400 W. Horizon Ridge Parkway
4 Telephone: (702) 477-7774
Facsimile: (702) 477-7778
5 ranalliservice@ranallilawyers.com
Attorneys for WALGREEN CO.

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 Darvis Lewis, individually,
10 Plaintiff.

11 vs.

12 WALGREEN CO., d/b/a Walgreen's;
and DOES 1 through 100; and ROE
13 CORPORATIONS 101 through 200,
14 Defendant.

Case No.: 2:18-cv-00827-JAD-PAL

STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES AND TRIAL
(First Request)

15 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES AND TRIAL**
16 **(First Request)**

17 Pursuant to Local Rules 6-1 and 26-4, the parties, by and
18 through their respective counsel of record, hereby stipulate to
19 and request that the Court extend the deadlines by ninety days.

20 **DISCOVERY COMPLETED**

21 The following discovery has been completed by the parties:

- 22 1. Proposed Joint Discovery Plan and Scheduling Order
23 dated July 13, 2018.

RANALLI ZANIEL FOWLER & MORAN, LLC
2400 W. HORIZON RIDGE PARKWAY
HENDERSON, NEVADA 89052
TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

2. Defendant's Initial FRCP 26(f) Disclosure dated June 26, 2018;
3. Plaintiff's First Set of Interrogatories to Defendant dated July 23, 2018.
4. Plaintiff's First Request for Production of Documents to Plaintiff dated July 24, 2018;
5. Defendant's First Request for Production of Documents to Plaintiff dated August 15, 2018;
6. Defendant's First Set of Interrogatories to Plaintiff dated August 15, 2018.

DISCOVERY TO BE COMPLETED

1. Obtain Plaintiff's medical records;
2. The parties may retain expert witnesses;
3. Depositions of parties;
4. Depositions of expert witness(es) and Plaintiff's treating physician(s).

REASONS THAT DISCOVERY HAS NOT YET BEEN COMPLETED

The parties have been working diligently to complete discovery. Defendant is still in the process of obtaining Plaintiff's medical records, including numerous records predating the subject accident from an accident which Defendant just recently became aware of and that are highly relevant to this case. As such, Defendant has found it difficult to

properly hire an expert to opine as to the causation of Plaintiff's injuries. Parties have been cooperative in exchanging disclosures and authorizations, but obtaining records has been slow going.

At this time, the parties seek a ninety (90) day extension of pending discovery deadlines as additional time is needed to complete the remaining discovery noted.

PROPOSED SCHEDULE OF DISCOVERY

The parties hereby stipulate to continue the Discovery as follows:

	<u>Current Deadline</u>	<u>Proposed</u>
Last Day to Amend Pleadings:	08/15/18	11/13/18
Initial Expert Disclosures:	09/14/18	12/13/18
Interim Status Report:	09/14/18	12/13/18
Rebuttal Expert Disclosures:	10/14/18	01/13/19
Discovery Deadline:	11/13/18	02/11/19
Dispositive Motion Deadline:	12/12/18	03/12/19
Joint Pre-Trial Order:	01/11/19	04/11/19

/ / /

/ / /

/ / /

/ / /

/ / /

1 SAID DISCOVERY REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY
2 DELAYING DISCOVERY OR TRIAL OF THIS MATTER

Bernstein & Poisson	RANALLI ZANIEL FOWLER & MORAN, LLC
Dated: August 17, 2018	Dated: August 17, 2018
<u>/s/ Jamie H. Corcoran, Esq.</u> Scott L. Poisson, Esq. Nevada Bar No.: 10188 Jamie H Corcoran, Esq. Nevada Bar No.: 11790 320 South Jones Blvd Las Vegas, Nevada 89107 Attorneys for Plaintiff DARVIS LEWIS	<u>/s/ Michael G. Trippiedi, Esq.</u> JAMES F. HOLTZ, ESQ. Nevada Bar No. 8119 MICHAEL G. TRIPPIEDI, ESQ. Nevada Bar No. 13973 2400 W. Horizon Ridge Parkway Henderson, Nevada 89052 Attorneys for Defendant WALGREEN CO.

12 ORDER

13 IT IS SO ORDERED:

14 Dated: August 21, 2018

15 
UNITED STATES MAGISTRATE JUDGE